

The Honorable Andrew Wheeler Acting Administrator U.S. Environmental Protection Agency 1200 Pennsylvania Avenue NW Washington, D.C. 20460

August 27, 2018

Dear Acting Administrator Wheeler:

The Pesticide Policy Coalition represents a wide range of organizations involved in meeting the needs of U.S. and global food and fiber production. American agriculture benefits greatly from the availability and use of new crop protection tools and technology platforms and we fully support robust risk-based regulatory programs that evaluate and register those tools in a timely and effective manner.

Specifically, we are writing to express our support for the extension of registrations of dicamba formulations developed to address current weed control needs in time for producers to make purchasing decisions for the 2019 crop year. In 2018, the industry worked to improve stewardship through training, application timing and open community communications. While we have faced challenges the past few years, we are dedicated to mitigating those challenges through continuous improvement through on-going training and education programs.

EPA has responsibility to ensure protection of health and the environment under the provisions of the Federal Insecticide, Rodenticide, and Fungicide Act (FIFRA). FIFRA also explicitly requires risk benefit balancing when making pesticide registration decisions. We view the newest technology platforms, including new formulations of dicamba, as essential tools in agricultural producers' management of herbicide-resistant weeds that are uncontrollable without this new technology. It is important that any change to product labels be realistic, feasible, and based on sound science that addresses the critical problem of herbicide-resistant weeds.

We appreciate the opportunity to express our views on how to help meet some of the current challenges facing agricultural producers. If more direct communication can be of help in your deliberations, we would welcome additional dialogue between growers, commercial applicators, and EPA on this important issue.

Sincerely,

Renee Munasifi

Chair, Pesticide Policy Coalition

Renie Murasifi

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Beau Greenwood

Vice Chair, Pesticide Policy Coalition

cc: Nancy B. Beck, Ph.D., Deputy Assistant Administrator, EPA-OCSPP
Rick P. Keigwin, Jr., Director, Office of Pesticide Programs, EPA-OSCPP
Sheryl Kunickis, Ph.D., Director, Office of Pesticide Management Policy, U.S. Department of Agriculture